

**Hearing Date and Time: October 19, 2006 at 10:00 a.m.**  
**Objection Deadline: October 12, 2005 at 4:00 p.m.**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b><i>In re:</i></b>	:
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	:
	:
DELPHI CORPORATION, <i>et al.</i> ,	:
	:
<b>Debtors.</b>	:
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**Chapter 11**  
**Case No. 05-44481 (RDD)**  
**(Jointly Administered)**

**RESPONSE OF UMICORE AUTOCAT CANADA CORP.  
TO DEBTORS' FIRST OMNIBUS CLAIMS OBJECTION**

Umicore Autocat Canada Corp. ("UACC"), by and through its undersigned counsel Hogan & Hartson L.L.P., respectfully responds to the Debtors' First Omnibus Claims Objection dated September 19, 2006 ( the "First Omnibus Claims Objection"), and states as follows:

1. Prior to the filing of the petitions for relief herein, UACC sold and provided products and services ("Pre-Petition Products and Services") to Delphi

Automotive Systems LLC (“DAS”) for the benefit of DAS and for the benefit of Delphi Corporation (“Delphi”). UACC continues to sell and provide post-petition products and services to DAS for the benefit of DAS and for the benefit of Delphi.

2. On July 28, 2006, UACC timely filed its claim for amounts outstanding and owed to it on account of Pre-Petition Products and Services against DAS in the amount of \$10,671,101.82 (the “Claim against DAS”). A true and correct copy of the Claim against DAS is attached hereto as Exhibit A and is incorporated herein by reference.

3. On July 28, 2006, UACC timely filed a second claim for amounts outstanding and owed to it on account of Pre-Petition Products and Services against Delphi in the amount of \$10,671,101.82 (the “Claim against Delphi”). A copy of the Claim against DAS was attached as an exhibit (the “Delphi Claim Exhibit”) to the Claim against Delphi. A true and correct copy of the Claim against Delphi is attached hereto as Exhibit B and is incorporated herein by reference.

4. The Claim against DAS was given Claim No. 12922 on the Delphi Claims Register.

5. The Claim against Delphi was given Claim No. 12923 on the Delphi Claims Register.

6. On the Delphi Claims Register, there appears to be a second UACC Claim against DAS, Claim No. 12924, a seeming duplicate of Claim No. 12922. UACC did not file a second Claim against DAS. Perhaps the copy of the Claim against DAS, filed as the Delphi Claim Exhibit, became detached from the

Claim against Delphi and was docketed as a second Claim against DAS, Claim N. 12924.

7. Because UACC did not intend to file two claims against DAS, UACC does not object to withdrawing or having expunged one of the Claims against DAS as long as one of the Claims against DAS and the Claim against Delphi are preserved and survive the First Omnibus Claims Objection.

8. Although UACC does not object to having one of the duplicate Claims against DAS disallowed or expunged, such action should be without prejudice to UACC because of its possible effect on the UACC Claim against Delphi if the Delphi Claim Exhibit was inadvertently detached from that claim.

9. Further, the UACC Claim against DAS contains the original signature of the authorized representative of UACC. Based on the status of the Delphi Claims Register, UACC does not know whether Claim No. 12922 or 12924 contains the original signature. Any disallowance or expunging of the “duplicate” UACC Claim against DAS should be without prejudice to UACC’s rights under the surviving UACC Claim against DAS if the claim with the original signature is disallowed or expunged.

10. UACC reserves the right to amend, modify and supplement both the surviving UACC Claim against DAS and the UACC Claim against Delphi.

**Wherefore**, the premises considered, Umicore Autocat Canada Corp. consents to the relief sought in the Debtor’s First Omnibus Claims Objection to the extent of disallowing or expunging the “duplicate” Claim against DAS, without

prejudice, however, to UACC because of its possible effect on the UACC Claim against Delphi if the Delphi Claim Exhibit was inadvertently detached from that claim, and without prejudice to UACC's rights under the surviving UACC Claim against DAS if the claim with the original signature is disallowed or expunged. Further, UACC requests that this court grant UACC whatever further relief the Court deems appropriate.

Dated: New York, New York  
October 12, 2006

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**CERTIFICATE OF SERVICE**

I certify that true and correct copies of the foregoing were served electronically (where email addresses are indicated, otherwise by overnight delivery) on October 12, 2006 on the following:

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